

Remarks

Reconsideration of the above-identified application is respectfully requested.

The undersigned would like to thank the Examiner for the telephone interview of today. In the telephone interview, the undersigned proposed amending claim 1 to further distinguish applicant's invention over Wolff by requiring that the multiple production outlets extend from the production passage adjacent each other in generally in the same direction. Subsequent to the telephone interview, however, the undersigned formulated the current amendment to claim 1, which is believed to more clearly distinguish applicant's invention over Wolff.

In response to the Examiner's request for a certified copy of the priority application, enclosed is a certified copy of UK Patent Application No. GB 0020591.4.

Claims 1, 3, 6, 7, 8, 10 and 13 stand rejected under 35 U.S.C. 102(b) as being anticipated by Wolff et al. (U.S. Patent No. 4,082,147). With respect to amended claim 1, however, Wolff does not disclose a christmas tree which comprises multiple production outlets that are connected to the *same end* of a generally horizontal production passage which in turn is connected to the vertical production bore. Even assuming *arguendo* that Wolff's christmas tree comprises two production outlets (i.e., the conduits containing the valves WV-1 and WV-2), and that these production outlets extend from a horizontal production passage (i.e., the conduit extending between the valves WV-1 and WV-2), the production

outlets nevertheless do not extend from the *same end* of the production passage but rather from *opposite ends* of the production passage.

Therefore, Wolff does not anticipate claim 1. Furthermore, since claims 3, 6 and 7 depend from claim 1, these claims are not anticipated by Wolff for the reasons stated above with respect to claim 1.

Also, claim 6 is independently patentable over Wolff because this patent does not disclose a horizontal Christmas tree. Applicant submits that a horizontal Christmas tree is generally understood by the person of ordinary skill in the art to include a vertical production bore in which a tubing hanger is landed and a horizontal production passage or outlet which communicates with a lateral production bore in the tubing hanger. The undersigned apologizes for any confusion which his previously proffered definition of horizontal Christmas tree may have caused the Examiner.

As evidence that this definition of horizontal Christmas tree is generally accepted by persons of ordinary skill in the art, applicant offers the following examples of patents which discuss such trees, copies of the selected portions of which are attached hereto as Exhibit A for the Examiner's convenience: U.S. Patent No. 6, 302, 212 (see column 1, lines 35-40); U.S. Patent No. 6,508,308 (see column 2, lines 45-62); U.S. Patent No. 6,581,691 (see column 2, lines 39-63); and U.S. Patent No. 6,598,680 (see column 1, lines 13-21).

In addition, this definition of horizontal Christmas tree is consistent with the usage of this term in the present application. For example, applicant states beginning on line 17 of page 2 as follows:

The prior art horizontal xmas tree shown in Fig. 1 has a vertical through bore 10 and a single horizontal production outlet 12 branched off from the vertical bore 10. Annular seals 14, 16 surround the vertical bore 10 above and below the production outlet 12, to seal a tubing hanger (not shown) in the vertical bore 10, as is conventional. . . .

The embodiment of the invention shown in Fig. 2 is similar, except that the horizontal outlet 12 from the production bore is split into two separate outlets 20, 22.

Therefore, the recitation of horizontal tree in claim 6 is sufficient to distinguish this claim from Wolff. Wolff's Christmas tree X is clearly not a horizontal Christmas tree because it does not accommodate a tubing hanger having a lateral production bore which communicates with the production passage in the tree. Consequently, Wolff cannot be found to anticipate claim 6.

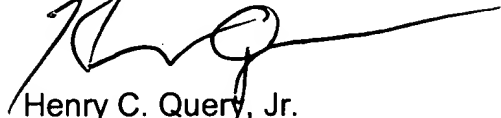
Similarly, Wolff cannot be found to anticipate independent claim 8 because this claim is limited to a horizontal Christmas tree. Furthermore, since claims 10 and 13 depend from claim 8, these claims are also novel over Wolff.

Claims 2, 4, 5, 9, 11 and 12 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Wolff alone. However, these claims depend from claims 1 and 8. Therefore, to the extent that the instant rejection is based on the Examiner's assertion that claims 1 and 8 are anticipated by Wolff, applicant submits that claims 2, 4, 5, 9, 11 and 12 are patentable over Wolff for the reasons stated above.

In light of the foregoing, claims 1-13 are submitted as allowable.

Favorable action is solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'H. Query, Jr.', with a long horizontal flourish extending to the right.

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Date: February 11, 2004